

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**Civil Action No. 17-cv-02453-PX**

**DAWN J. BENNETT, BRADLEY C.  
MASCHO, and DJB HOLDINGS, LLC,**

**Defendants.**

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANTS  
DAWN J. BENNETT AND DJB HOLDINGS, LLC**

Plaintiff Securities and Exchange Commission (the "Commission") hereby moves for summary judgment under Rule 56 of the Federal Rules of Civil Procedure and entry of relief against defendants Dawn J. Bennett and DJB Holdings, Inc. ("Defendants"). The grounds for this motion are stated fully in the accompanying memorandum of law, statement of material undisputed facts, and all exhibits attached thereto, which are incorporated herein by reference.

WHEREFORE, Plaintiff Securities and Exchange Commission respectfully requests that this Court enter summary judgment in favor of the Commission and against Defendants; permanently enjoin Defendants from future violations of Section 17(a) of the Securities Act of 1933 and Sections 5 and 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder; and order disgorgement of Defendants ill-gotten gains, jointly and severally, but deem such liability satisfied by the restitution order against Bennett in *U.S. v. Bennett, et al.*, Crim. No. 8:17-CR-472-PX (D. Md.).

Respectfully submitted,

/s/ Karen M. Klotz

Jennifer Chun Barry

Karen M. Klotz

Email: KlotzK@sec.gov

*Attorney for Plaintiff*

*Securities and Exchange Commission*

Dated: April 5, 2021.

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April, 2021, I caused a true and correct copy of the foregoing Motion of Plaintiff Securities and Exchange Commission for Summary Judgment as to Defendants Dawn J. Bennett and DJB Holdings LLC, the statement of material uncontested facts, memorandum of law, and proposed order to be served upon counsel of record via ECF and upon the following individual by U.S. Mail:

Ms. Dawn J. Bennett  
Register Number: 92603-051  
FPC Alderson  
Federal Prison Camp  
Glen Ray Road Box A  
Alderson, WV 24910

/s/ Karen M. Klotz  
Karen M. Klotz